## Remarks

Claims 1, 7, 12, 16 and 20 have been amended and new claims 27-36 have been added. Reconsideration of the Application is respectfully requested in view of the submitted amendments and the following argument.

Claims 1 and 20 have been amended to correct obvious typographical errors.

Claims 7, 12 and 16 are rejected as anticipated by Suzuki (U.S. Pat. No. 6,549,947). For the following reasons, Suzuki does not anticipate these claims.

Suzuki discloses a system for controlling a "dumb" printer from a host computer. The system includes a printer driver that generates print data and a printer monitor that controls the printer device. Both the printer driver and the printer monitor include a graphical user interface (GUI). The printer driver GUI displays printer status data to the user and printer monitor GUI displays printer errors or warnings. However, Suzuki does not disclose or suggest a list of status or error data comparable to the list or lists of conflicts required in claims 7, 12 and 16.

In particular, claim 7 defines the invention as including "a conflict dialog module coupled to the printer data module and having a list of conflicts, each conflict corresponding to a condition of the printer and a selected predetermined action to be executed by the printer, the printer data module causing the conflict dialog module to generate a conflict from the list of conflicts." It is argued that column 2, lines 6-8, and column 5, lines 52-64 of Suzuki disclose the conflict dialog element defined in claim 7. Suzuki describes the use of status and error data displayed on the user interface screen. However, Suzuki does not disclose or suggest employing a list of conflicts of the type displayed by the claimed invention.

Claim 12 defines the invention as a method that includes the step of "generating a conflict corresponding to a condition of the printer and a selected predetermined action to be executed by the printer from a list of conflicts." The printer described in column 6, lines 60-63 of Suzuki is capable of performing the steps of checking the status of the printer and checking for an error as well as returning status and error data to the printer monitor. However, Suzuki does not disclose or

suggest generating a conflict corresponding to a condition of the printer and a predetermined action to be executed by the printer from a list of conflicts in a conflict module.

Claim 16 defines the invention as a system for managing data including "a dialog means for generating a conflict from a list of conflicts, wherein each conflict is corresponding to a condition of the printer and a selected predetermined action to be executed by the printer." As discussed above, Suzuki does not disclose or suggest a system that includes a list of conflicts, where a "conflict" corresponds to both a condition of the printer and an action to be executed by the printer.

Thus, it is submitted that claims 7, 12 and 16 define over Suzuki on the basis that Suzuki does not disclose or suggest an element of each of the claims, namely a list of conflicts of the type defined in the claims. Accordingly, claims 7, 12 and 16 and the claims depending from them are not anticipated by Suzuki and should be allowed.

In addition, claims 7, 12 and 16 have been amended to emphasize the independence of the modules or elements. In particular, claims 7 and 12 have been amended to specify that the printer properties main dialog module, the printer data module and the conflict dialog module are independently modifiable, such that a modification of one of the modules does not affect at least one of the other modules. Claim 16 has been amended to specify that the processing means, the operating means and the dialog means are independently modifiable, such that a modification of one of the processing means, the operating means or the dialog means does not affect at least one of the other two means. Thus, claims 7, 12 and 16 have been amended to more clearly emphasize the independent nature of the modules or elements of the claimed invention. In view of the foregoing, claims 7, 12 and 16 are not anticipated by Suzuki and should be allowed.

Claim 1 is rejected as defining obvious subject matter over Suzuki combined with Sieffert (U.S. Pat. No. 5,630,101). For the following reasons, claim 1 is not rendered obvious by this combination of references.

Sieffert discloses a system for translating image data between multiple input and output imaging devices using different communication protocols. Sieffert suggests utilizing multiple, independent software components to control a number of hardware devices and separate software

components to translate image data between communication protocols (Sieffert, col. 2, l. 60 - col. 3, l. 20). Components may be selected and assembled to create a communication pipeline connecting an input image device with an output image device. The modular structure of the components allows the system to be modified to handle different imaging devices by swapping out components. The system described in Sieffert is designed to facilitate communication between numerous different types of input and output imaging devices.

Claim 1 defines the invention as an operating system for managing data in a computer including a main dialog module containing GUI code, a data module containing operating code and a conflict dialog module that generates a conflict from a list of conflicts, where "the list of conflicts of the conflict dialog module is unaffected by a modification to the GUI code." It is argued that Suzuki discloses a main dialog module, a data module and a conflict dialog module and that Sieffert discloses the use discrete software components.

As discussed in detail above, Sieffert discloses a system for translating image data between multiple input and output imaging devices using different communication protocols. The system described in Sieffert is designed to facilitate communication between numerous different types of input and output imaging devices. In contrast, claim 1 describes an interface between a user and a single host processor of a computer.

Neither Sieffert nor Suzuki discloses utilizing an independently modifiable module for GUI code. Sieffert has no discussion of a user interface at all. In Suzuki, GUI code is included in both the printer driver and printer monitor (Suzuki Fig. 1, col. 5, ll. 58-63, col. 6, ll. 8-9). Thus, it would not be obvious to one of ordinary skill in the art, having the teachings of Suzuki and Sieffert before him, to create an interface between a user and a host processor where the GUI module is independently modifiable, such that modification of the GUI does not affect the list of conflicts, as disclosed in amended claim 1.

Independent claim 20 also defines over the proposed combination of Suzuki and Sieffert. Claim 20 defines the invention as a computer program that requires instructions within the computer readable medium for generating a GUI where "the instructions within the computer

readable medium for generating GUI and the instructions within the computer readable medium for producing a list of conflicts are independently modifiable, and when the instructions within the computer readable medium for generating GUI are modified with a modification, the instructions within the computer readable medium for producing a list of conflicts are unaffected by the modification." As discussed above, the system described in Sieffert does not include a GUI. Neither Suzuki nor Sieffert teaches a program in which instructions for generating a GUI are independent from the instructions for generating a conflict list, such that the GUI instructions may modified without affecting or influencing the instructions generating a conflict list as required in claim 20. Thus, it is submitted that it would not be obvious to one of ordinary skill in the art, having the teachings of Suzuki and Sieffert before him, to create an interface for operating a printer where the GUI module is independently modifiable, such that modification of the GUI does not affect the list of conflicts, as disclosed in claim 20 of the present invention.

Claims 2-4 are rejected as defining obvious subject matter over Suzuki combined with Sieffert. However, claims 2-4 depend from claim 1 and distinguish over Suzuki and Sieffert for at least these same reasons.

Dependent claim 9 defines the invention as a system for managing data in a Windows® environment of a computer in which modification of the GUI code does not affect the operating code of the printer data module and dependent claims 11, 14 and 18 require that modification of the GUI code not affect the list of conflicts. As discussed above, since the software of Sieffert does not include GUI code, Sieffert cannot teach or suggest the functionality of modifying GUI code without affecting the operating code or the list of conflicts. Therefore, Sieffert cannot be used to add this element to Suzuki.

Dependent claims 8, 13 and 17 define the invention as a system for managing data in a Windows® environment in which modification of the conflict list does not affect the GUI code and dependent claims 10, 15 and 19 further define the system as one in which modification of the operating code does not affect the GUI code.

Therefore, in contrast to the system defined in claims 8-11, 13-15 and 17-19, the combination of Suzuki and Sieffert fails to disclose the claimed system in which either modification of GUI code does not affect other modules in the system or modification of other modules does not affect the GUI code. Thus, it would not be obvious to one of ordinary skill in the art, having the teachings of Suzuki and Sieffert before him, to create an interface for operating a printer where the GUI module, the data module and the conflict dialog module are independently modifiable, such that modification of the GUI does not affect the data module or the list of conflicts or such that modification of the data module or the list of conflicts does not affect the GUI module.

Claims 5 and 6 depend from claim 1 and distinguish over Suzuki and Sieffert for at least these same reasons.

Claims 21-26 depend from claim 20 and therefore distinguish over the purported combination of Suzuki and Sieffert for at least these same reasons.

New claim 27 depends from claim 1 and specifies that one of the main dialog module, the data module or the conflict dialog module may be modified without affecting either of the other two modules. New claims 28-31 depend from claims 7, 12, 16 and 20, respectively, and include limitations similar to those of claim 27.

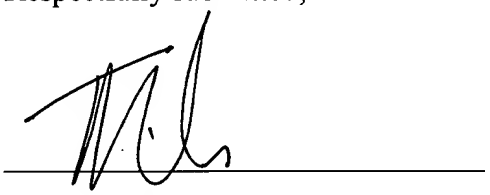
New claim 32 is independent and specifies a method for modifying a system for managing data, comprising the step of modifying one of printer properties main dialog module, the printer data module or the conflict dialog module without affecting at least one of the other modules. New claim 33 depends from new claim 32 and specifies that one of the modules may be modified without affecting either of the other modules. New claim 34 depends from new claim 32 and specifies that the list of conflicts of the conflict dialog module may be modified without affecting the GUI code of the printer properties main dialog module. New claim 35 depends from new claim 32 and specifies that the GUI code of the printer properties main dialog module may be modified without affecting the list of conflicts of the conflict dialog module. New claim 36 depends from new claim 32 and specifies that operating code of the printer data module may be modified without affecting the GUI code of the printer properties main dialog module. None of the foregoing

limitations of claims 32-36 are taught or suggested by the proposed combination of Suzuki and Sieffert. Accordingly, claims 32-36 should be allowed for these additional reasons.

In view of the foregoing arguments and amendments, it is submitted that the application is in a condition for allowance and a formal notice thereof is respectfully requested.

The Commissioner is hereby authorized to charge any additional fees required, including the fee for an extension of time, or to credit any overpayment to Deposit Account 20-0809. The applicant(s) hereby authorizes the Commissioner under 37 C.F.R. §1.136(a)(3) to treat any paper that is filed in this application which requires an extension of time as incorporating a request for such an extension.

Respectfully submitted,



Theodore D. Lienesch
Reg. No. 28,235

THOMPSON HINE LLP
2000 Courthouse Plaza NE
P. O. Box 8801
Dayton, Ohio 45401-8801
Telephone: (937) 443-6958
Facsimile: (937) 443-6635

362966.7